

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
(WILKES-BARRE)**

IN RE:)	
VINCENT GRAHAM,)	CASE NO.: 5:23-bk-00162-MJC
)	CHAPTER 13
DEBTOR.)	JUDGE MARK J. CONWAY
)	
MCLP ASSET COMPANY, INC. AS SERVICER))	
FOR NEWREZ LLC D/B/A SHELLPOINT)	
MORTGAGE SERVICING)	
)	
CREDITOR)	
)	
VINCENT GRAHAM, DEBTOR)	
AND JACK N ZAHAROPOULOS, TRUSTEE)	
)	
RESPONDENTS)	

**CERTIFICATE OF NO OBJECTION REGARDING MCLP ASSEST COMPANY, INC. AS
SERVICER FOR NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING 'S
MOTION FOR RELIEF (DOCKET NO. 49)**

I, Joshua I. Goldman, Esquire, attorney for Movant, do hereby certify that to the best of my knowledge, information, and belief, no answer or objection has been filed by the Debtor or the Trustee on the Motion for Relief that was filed on November 10, 2023. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than November 27, 2023.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully Submitted,

/s/ Joshua I. Goldman

Joshua I. Goldman, Esq.

Pennsylvania Bar # 205047

PADGETT LAW GROUP

6267 Old Water Oak Road, Suite 203

Tallahassee, FL 32312

(850) 422-2520 (telephone)

(850) 422-2567 (facsimile)

josh.goldman@padgettlawgroup.com

Counsel for Movant

CERTIFICATE OF SERVICE

I, Joshua I. Goldman, attorney for Movant, do hereby certify that true and correct Copies of the foregoing Certificate of No Objection have been served on November 28, 2023, by first class mail, and/or electronic means upon those listed below:

Respectfully submitted,

/s/ Joshua I. Goldman

JOSHUA I. GOLDMAN, ESQ.

Pennsylvania Bar # 205047

PADGETT LAW GROUP

6267 Old Water Oak Road, Suite 203

Tallahassee, FL 32312

(850) 422-2520 (telephone)

(850) 422-2567 (facsimile)

josh.goldman@padgettlawgroup.com

Counsel for Movant

SERVICE LIST (CASE NO. 5:23-bk-00162-MJC)

DEBTORS

VINCENT GRAHAM
585-587 MCKINLEY ST
HAZLETON, PA 18201-4009

ATTORNEYS FOR DEBTOR

MICHAEL A. CIBIK
CIBIK LAW, P.C.
1500 WALNUT STREET
SUITE 900
PHILADELPHIA, PA 19102
MAIL@CIBIKLAW.COM

TRUSTEE

JACK N ZAHAROPOULOS
STANDING CHAPTER 13
(TRUSTEE)
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036
INFO@PAMD13TRUSTEE.COM

U.S. TRUSTEE

ASST. U.S. TRUSTEE
UNITED STATES TRUSTEE
US COURTHOUSE
1501 N. 6TH ST
HARRISBURG, PA 17102
USTPREGION03.HA.ECF@USDOJ.GOV